# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

TruePosition, Inc.,	
Plaintiff/ ) Counterclaim-Defendant, ) v.	Civil Action No. 05-747-SLR
Andrew Corporation,	REDACTED VERSION DI 159
Defendant/ ) Counterclaim-Plaintiff. )	

## APPENDIX B

TO

BRIEF IN OPPOSITION TO ANDREW'S MOTION FOR SUMMARY JUDGMENT OF INVALIDITY OF CLAIM 22 OF THE '144 PATENT FOR INDEFINITENESS

PART 3 B382-B413

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# APPENDIX B

## TO

# BRIEF IN OPPOSITION TO ANDREW'S MOTION FOR SUMMARY JUDGMENT OF INVALIDITY OF CLAIM 22 OF THE '144 PATENT FOR **INDEFINITENESS**

PART 3

B382-B413

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From: Shira Kapplin [SKapplin@kirkland.com]
Sent: Wednesday, January 03, 2007 5:33 PM
To: Goettle, Daniel J. (Woodcock Washburn)

To: Goettle, Daniel J. (Woodcock Washburn)

Co: mparks@kirkland.com; Rachel Pernic Waldron

Subject: RE: TruePosition v. Andrew: LCS client database schema and fiels of the schema

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Shira J, Kapplin Kirkland & Ellis LLP 312.861.3170 312.846.9194 (facsimile) 200 East Randolph Drive Chicago, IL 60601-6636

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Page 2

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Page 4"

B386

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

TRUEPOSITION, INC.,

Plaintiff, )

v. ) Civil Action

ANDREW CORPORATION, ) No. 05-747

Defendant. )

والمراجعة المراجعة ال

CONFIDENTIAL

Videotaped Deposition of IRIS INBAR

Reston, Virginia

Tuesday, November 21, 2006

9:11 a.m.

Job No.: 22-91054

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Reported By: Joan V. Cain

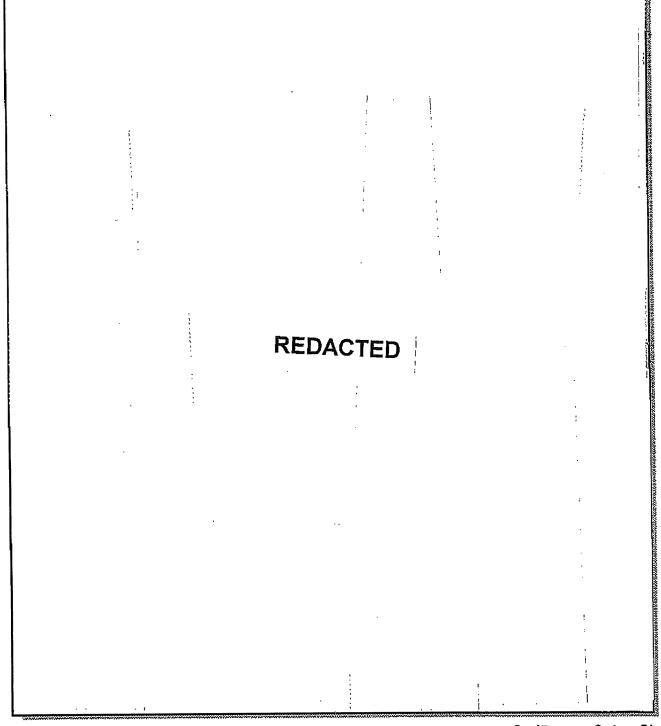
Virginia CCR No. 0315117

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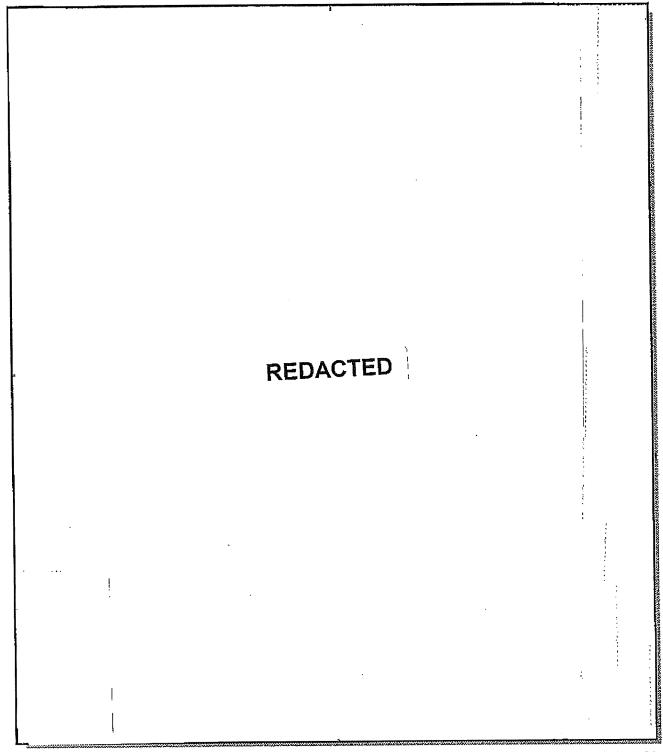
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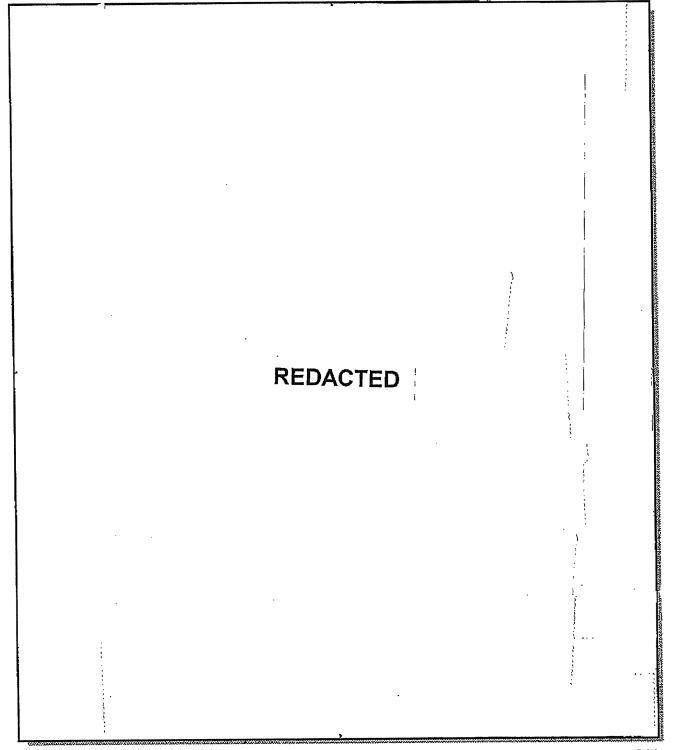
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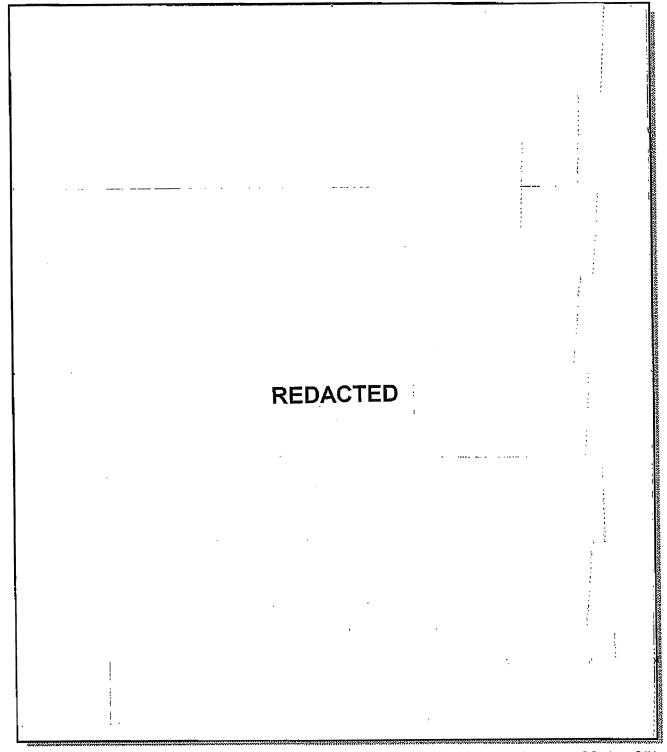
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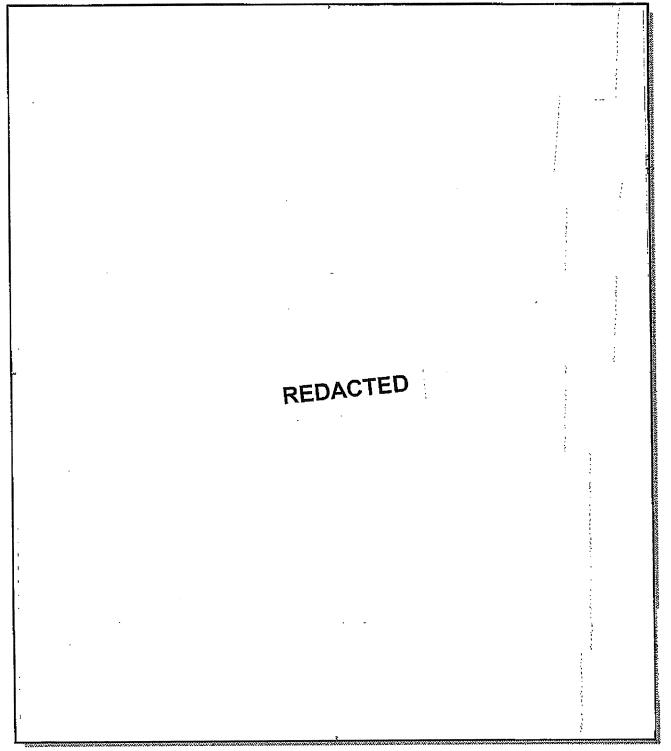
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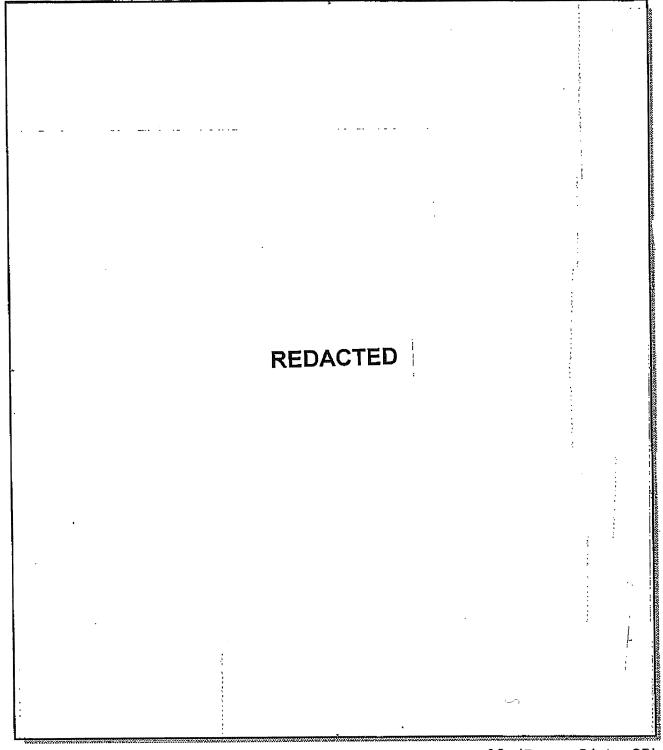
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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

TRUEFOSITION, INC., ) plaintiff, ) CIVIL ACTION NO. 05-747

ANDREW CORPORATION, ) Defendant. )

\*

ORAL AND VIDEOTAPED DEPOSITION OF

RANDY B. WYNN

OCTOBER 10, 2006

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF RANDY B. WYNN, produced as a witness at the instance of the PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause on the 10th day of October, 2006, from 9:25 a.m. to 3:43 p.m., before Julie C. Brandt, RMR, CRR, and CSR in and for the State of Texas, reported by machine shorthand, at the Hyatt Regency DFW, International Parkway, Dallas, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

B398

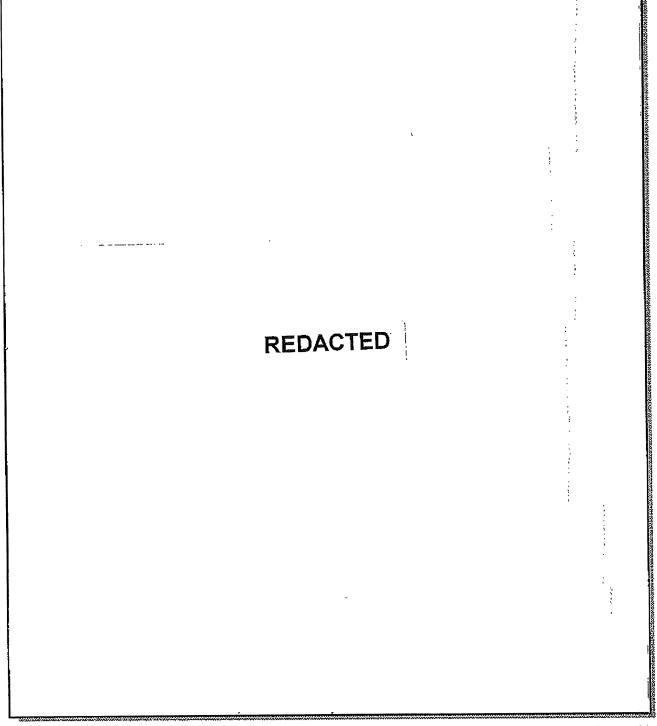
Page 1

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1 APPEARANCES	1 EXHIBITS (CONTINUED)
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FOR THE PLAINTIFF:	Subject: Audrew Phase 2
David L. Marcus	4 144 E-mail from Jim MoDaniol, June 14, 2006
4 WOODCOCK WASHBURN, ILP One Liberty Piace	5 Subject FW: STC Phase 3 - LOL. 145 6 145 E-mail from Mohamed Bissa, Appust 2, 2036
5 46th Floor -	Subject: RB: Contract expansion
Philadelphia, PA 19103 6 215.568.3100	7 146 E-mail from Falid Sirobsy, July 16, 2006
215.568.3439 (fax)	8 Subject: FW: LBS_Phase2_Shc_
7 dmarcus@woodcock.com 8	Configurations Alemannan, 149
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12 312,861,3170	150 E-mail from Ilm McDanlet, Feb. 20, 2006 15 Subject Updated: Ericsson support issues, 159
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21 140 H-mail from Andrew Beck, Dec, 19, 2005	21
22 FW: MTLR ro-violed,	B399
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142 Bensil from Jim McDenlel, April 26, 2006	24
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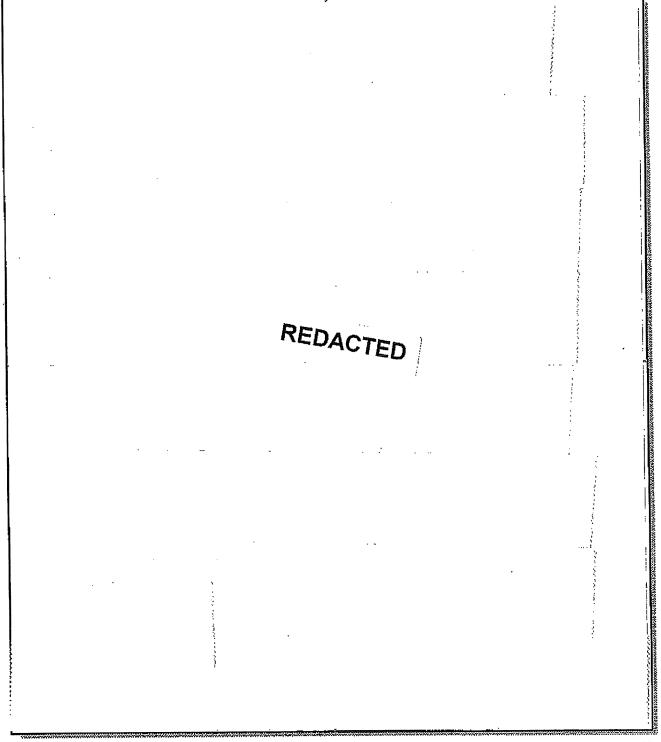
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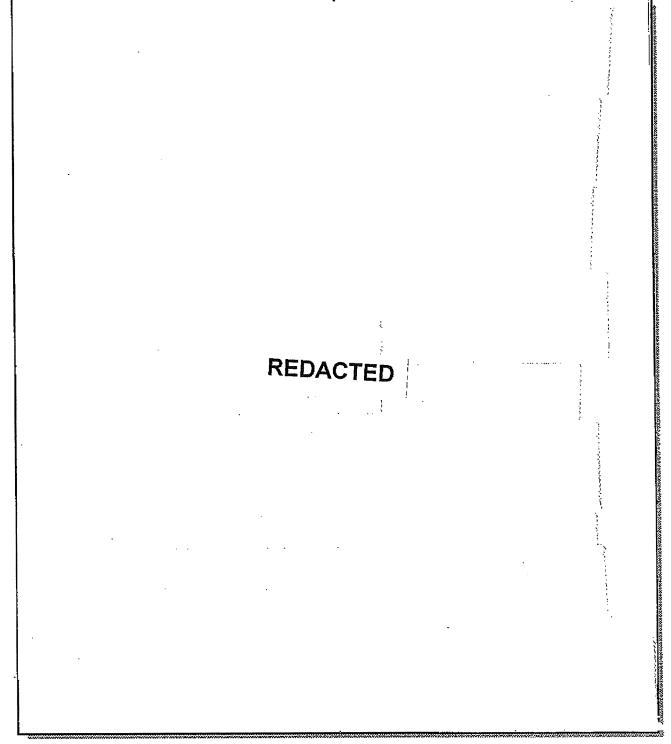
	Page 1
IN THE UNITED STATES DISTRICT COURT	
FOR THE DISTRICT OF DELAWARE	
TRUEPOSITION, INC., )	
Plaintiff, )	
v. ) Civil Action	
ANDREW CORPORATION, ) NO. 05-747	
Defendant.	
Detendanc.	
CONFIDENTIAL	
Videotaped Deposition of MAZIN FAGIRI	
Friday, November 3, 2006	
Reston, Virginia	
1:40 p.m.	:
Job No.: 22-90165	
Pages: 1 through 132	
Reported by: Bess A. Avery, RMR	
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5	11810 Sunrise Valley Drive	5	By Ms. Kapplin 126	
б	Reston, Virginia 20191	6	By Mr. Marcus 126	
7	(703) 620-9000	7	EXHIBITS	
8		8	(Attached to the transcript.)	
9		9	DEPOSITION EXHIBIT NUMBER. PAGE	
10		10		25
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15		15	339 Andrew Production Number ANDEF137363	9,
16	Pursuant to notice, before Bess A. Avery,	16		9
17	Registered Merit Reporter and Notary Public in and	17	341 Andrew Production Number ANDEF128779	10
18	for the Commonwealth of Virginia at large.	18	342 Printont from STC's web site 110	
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1 2	Page 3 APPEARANCES	1 2	Page MAZIN FAGIRI PROCEEDINGS	
3	ON BEHALF OF THE PLAINTIFF:	13:24:013	THE VIDEOGRAPHER: Here begins Vide	oti
4	DAVID L. MARCUS, ESQUIRE	13:40:00 4	Number 1 in the deposition Mazin Fagiri in the	
5	WOODCOCK WASHBURN LLP	13:40:045	matter of Trueposition, Inc. versus Andrew Corp.	
6	One Liberty Place	13:40:07 6	pending in the U.S. District Court for the District	
) ÿ	45th Floor	13:40:107	of Delaware, Case Number 05-747.	
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11	ON BEHALF OF THE DEFENDANT:	13:40:2411		,
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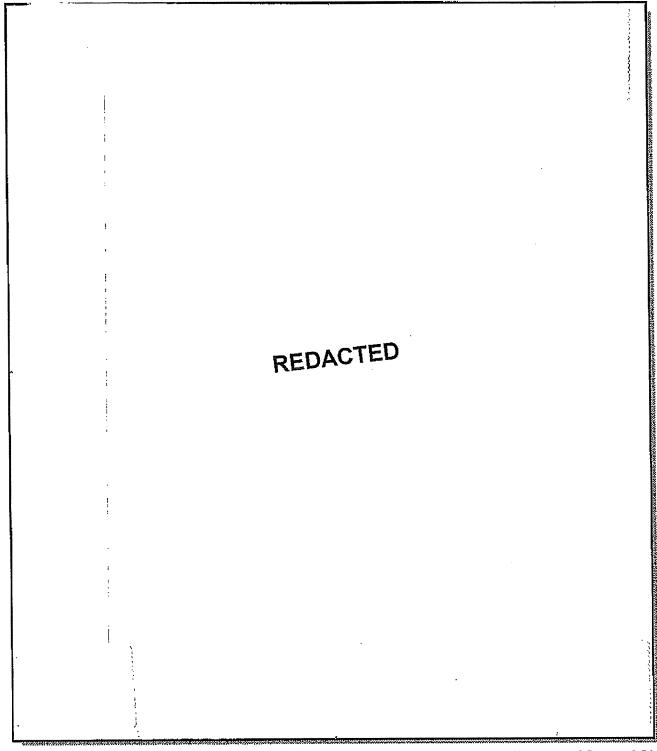
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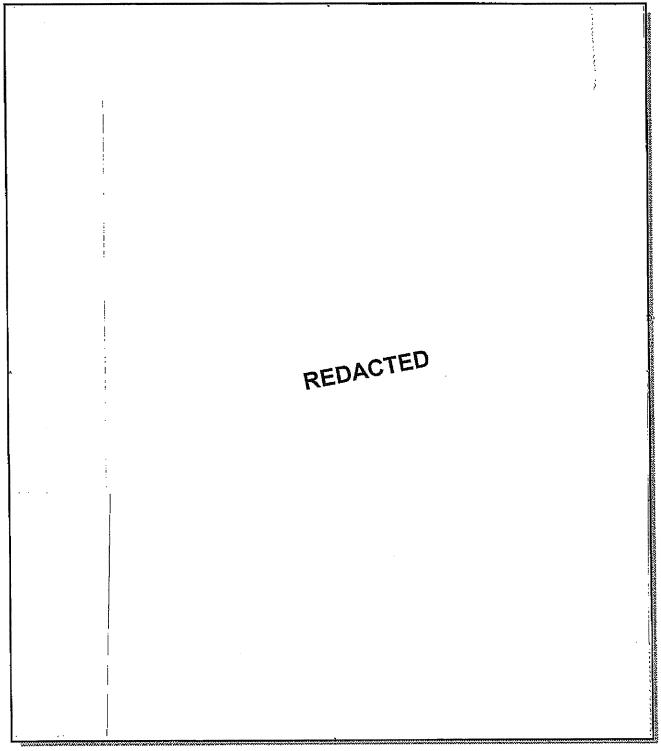
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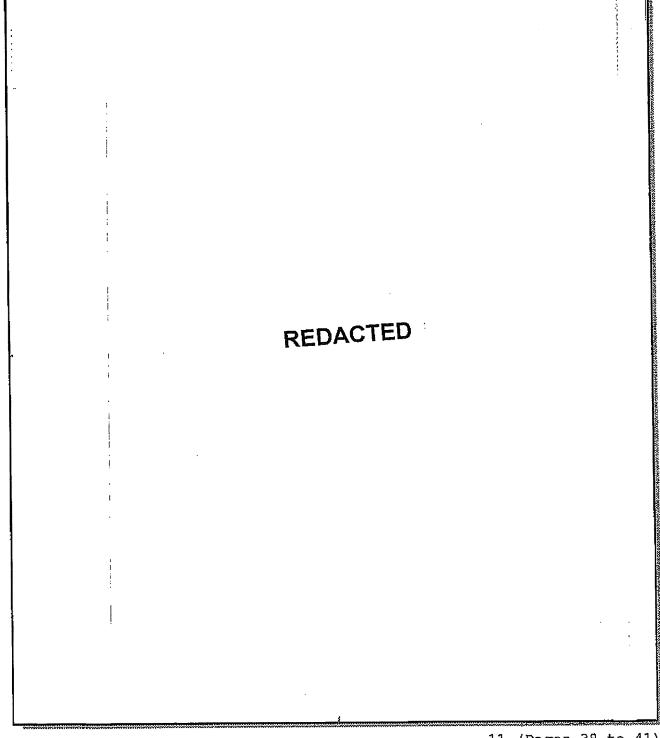
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### **CERTIFICATE OF SERVICE**

I, James D. Heisman, hereby certify that on this 27<sup>th</sup> day of February, 2007, I caused a true and correct copy of the foregoing **APPENDIX B TO BRIEF IN OPPOSITION**TO ANDREW'S MOTION FOR SUMMARY JUDGMENT OF INVALIDITY OF CLAIM 22 OF THE '144 PATENT FOR INDEFINITENESS PART 3

B382-B413 to be served upon the following individuals in the manner indicated below:

Via hand-delivery

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Rachel Pernic Waldron, Esq. Kirkland & Ellis LLP 200 East Randolph Drive Chicago, IL 60601 rpernicwaldron@kirkland.com Via e-mail

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Washington, DC 20006-1608
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/s/ James D. Heisman
James D. Heisman (# 2746)